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9 Attorneys for Plaintiff  
10 Guisela Aguirre Guerra

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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

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10 GUISELA AGUIRRE GUERRA

CASE No. 3:18-cv-00376-LRH-CBC

11 Plaintiff,

12 vs.

13 DEMATIC CORP., a Delaware  
14 Corporation; and DOES 1-25; and  
15 BLACK CORPORATION A-Z,

16 Defendant(s).  
17 \_\_\_\_\_/

**STIPULATION AND ORDER  
REGARDING DISCOVERY OF  
ELECTRONIC RECORDS**

18 DEMATIC CORP.,

19 Third Party Plaintiff

20 vs.

21 SALLY BEAUTY SUPPLY, LLC fka  
22 SALLY BEAUTY COMPANY, INC.,

23 Third Party Defendant

24 Plaintiff GUISELA AGUIRRE GUERRA ("Plaintiff"), Defendant/Third Party  
25 Plaintiff DEMATIC CORP. and Third Party Defendant SALLY BEAUTY SUPPLY,  
26 LLC, fka SALLY BEAUTY COMPANY, INC. hereby stipulate to the entry of an Order  
27 consistent with the foregoing Stipulation.

28 The parties hereto stipulate that Dematic Corp. represents that there is no

1 electronically stored information regarding the design of the "Gravity Gate" product  
2 at issue in this matter. The Gravity Gate at issue was designed and developed in  
3 1962, and manufactured and sold in 1993. No design changes have been made  
4 since 1962, and the only records regarding the design (including any risk  
5 assessments) are in paper form and all such records have been produced by Dematic  
6 Corp.

7 The parties hereby further stipulate that Sally Beauty Supply, LLC represents  
8 that there is no electronically stored information regarding its alleged removal of the  
9 safety latch on the Gravity Gate.

10 DATED this 27<sup>th</sup> day of August, 2019

11 Law Office of Steven P. Brazelton

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19 Guisela Aguirre Guerra

20 Dated this 27<sup>th</sup> day of August, 2019

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28 Attorneys for Defendant / Third Party Plaintiff

Dematic Corp.

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2 Dated this 27<sup>th</sup> day of August, 2019

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Lewis Brisbois Bisgaard & Smith, LLP

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Attorneys for Third Party Defendant  
10 Sally Beauty Supply, LLC

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IT IS SO ORDERED.

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15 U.S. Magistrate Judge

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DATED:

8/28/2019

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